

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMAL D. HOLDMAN,

Defendant.

8:21CR193

MOTION TO RETROACTIVELY
REVISE AND EXTEND THE
PRETRIAL DEADLINES SET FORTH
IN THE PROGRESSION ORDER

COMES NOW the Plaintiff, United States of America, by and through the undersigned Assistant United States Attorney for the District of Nebraska, and hereby moves the Court to retroactively extend the deadlines for production of Rule 16 discovery and for pretrial motions as set forth in the progression order.

In support of this motion, the government shows as follows:

1. Defendant appeared in Nebraska on a Criminal Complaint (Doc. #1) on July 16, 2021. Defendant was not ordered detained.
2. An Indictment (Doc. # 13) was filed on July 21, 2021 and remained under seal until August 5, 2021 when the codefendant was arrested in California.
3. Defendant filed a Waiver of Personal Appearance at Arraignment and Order on July 29, 2021 (Doc. # 17). Plaintiff did not receive notice that a Progression Order had been issued because the Indictment was still under seal.
4. Plaintiff provided defense counsel substantial discovery “in advance” on August 2, 2021.

5. On August 9, 2021, Plaintiff became aware that a Progression Order (Doc. # 18) had been issued by the Court on July 29, 2021, setting an August 5th deadline for Rule 16 discovery and an August 18th deadline for pretrial motions.
6. Plaintiff attempted to contact defense counsel to ascertain his position regarding Plaintiff's motion on August 9th and 11th but has been unsuccessful.

WHEREFORE, the United States respectfully requests that the Court retroactively revise and extend the deadlines set forth in the Progression Order (Doc. # 18). Plaintiff requests that the Court set an August 18th deadline to produce Rule 16 discovery and a September 1st deadline for pretrial motions.

UNITED STATES OF AMERICA,
Plaintiff

JAN W. SHARP
Acting United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all registered participants.

s/ Christopher L. Ferretti
Assistant U.S. Attorney